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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
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1998 Biennial Regulatory Review; ) WT Docket No. 98-143  
Amendment of Part 97 of the Commission's )  
Amateur Radio Service Rules )  
  
To: The Commission

**COMMENTS OF KENWOOD COMMUNICATIONS CORPORATION**

Kenwood Communications Corporation (Kenwood), one of the largest manufacturers of amateur radio equipment in the United States, by its President, hereby submits its comments pursuant to Section 1.415 of the Commission's Rules, in response to the *Notice of Proposed Rule Making* (the Notice), FCC 98-183, released August 10, 1998.<sup>1</sup> The Notice seeks to simplify and streamline the Amateur Radio Service rules, and to eliminate those which are no longer necessary.

1. Kenwood has been supplying quality products to the Amateur Service for many years, and notes that the Amateur Service remains the best source of self-trained telecommunications technical persons in the country. It is not only a healthy pastime, but is perhaps the most educational activity that is regulated by the Commission. Kenwood is dedicated to the growth and enhancement of the Amateur Service, and agrees with the Commission that the license

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<sup>1</sup> See also the *Errata* in this proceeding, released August 31, 1998.

structure of the Amateur Service is in need of updating. It is no longer conducive to encouraging growth, at a time when people of all generations have little free time and extremely extensive activities that compete for available time.

2. Therefore, the licensing structure for the Amateur Service should be made more simple. Kenwood's amateur products are sold to a worldwide market, and Kenwood is very much aware of the amateur licensing structure in other countries. The United States has, unquestionably, the most elaborate, multi-level licensing structure in the world.<sup>2</sup> Amateur radio licensing should test minimum qualifications for a licensee, to make sure that the licensee has the basic understanding of various levels of amateur radio operating activities and radio technical theory. This assures that the licensee is encouraged to pursue additional self-training without restrictions. The license levels should be simple and straightforward, with sufficient operating privileges at each level to both encourage newcomers and promote advancement by existing licensees.

3. Kenwood has reviewed the comments in this docket proceeding filed by the National Conference of VECs (NCVEC), and is supportive generally of the views expressed in those comments concerning the license structure of the Amateur Service, and revisions to the examination process. As a general principle, Kenwood believes that there is a shortage of qualified RF engineers and technical professionals. The Amateur Service has the capacity to self-

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<sup>2</sup> The table of equivalencies in the European Conference of Postal and Telecommunications Administrations (CEPT) Recommendation T/R 61-01 for Amateur reciprocal operating, for example, includes only two classes of license, one which conveys only VHF privileges, and the other which conveys all privileges. The assumption is that CEPT participants and members' regulations correspond to those two categories.

educate those with an interest in RF technology. To bring these persons "to the table", both entry into Amateur Radio and self-training in the radio art must be facilitated, consistent with assuring that licensees are serious-minded and disciplined enough individuals. The licensing of persons proficient in Morse Code is inconsistent with encouraging those interested in modern telecommunications to join the ranks of amateurs and to become skilled in the technical sciences. Amateur radio should be enjoyable, and amateur operation should also be considered a public service. Burdensome examination requirements on topics not relevant to a person's interest in amateur radio or their ability to operate an amateur station should be eliminated. Kenwood is concerned, however, that operating privileges should be an incentive for technical self-training and investigation, not as an end in themselves.

4. The way to reach these goals is by reducing Morse Code examination requirements, and by elimination of written questions on examinations that call for memorization of operating trivia, and to focus instead on technical theory that a licensee in a technical avocation should be expected to know. It is by these requirements that the Commission might expect radio amateurs to further the technical art of telecommunications, rather than administering a purely hobby-type service.

5. The specific license structure supported by Kenwood would be three license classes: Technician, General and Extra Class. These three license classes should correspond to the Technician, General and Extra Classes now.<sup>3</sup> However, there should only be one level of Morse

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<sup>3</sup> It is important to retain the Technician, General and Extra Class names for the newly-restructured license classes, in order to maintain some sense of consistency among existing amateur licensees. There is a sense of achievement that these licensees have that is identified with the license class name.

Code examination, that being at the General Class level, tested at 5 words-per-minute. Any greater speed is unnecessary, and the current 13 words-per-minute requirement for the General Class license is a barrier to someone who wants to have access to bands below VHF, and wants to upgrade from Technician to General Class.

6. The justification for retaining Morse Code competence as an examination requirement is waning, as the Commission notes. It is still, and will undoubtedly remain, a very popular means of regular amateur communications. It is an operating mode which has application in international communications, and is one of the many communications techniques that amateur radio operators should experiment with and enjoy. That is not, however, a sufficient justification for keeping it as a license requirement. It is not a telecommunications skill used often in emergency communications or disaster relief any longer, and emphasis on it as a licensing filter is properly reduced in United States amateur licensing. The international requirement for Morse Code proficiency as a licensing requirement may in the future be eliminated. Until that time, some Morse Code proficiency must remain as a license requirement. It is not clear now whether all Morse testing should thereafter be eliminated. It should, however, be minimized, and a 5 word-per-minute examination is sufficient as a test of Morse Code competency.

7. Kenwood would otherwise support the NCVEC plan for revising the written examinations, to increase the number of questions for each license class, but it is very much concerned that NCVEC proposes a 50-question examination for Technician Class licensees. It is true that under the current licensing plan, a candidate for a Technician Class license has to take element 2 (25 questions) and element 3(A) (30 questions). However, the Novice examination is largely irrelevant to a VHF-only license class, and there should be a less-daunting number of

questions, and less complexity, on the Technician Class examination. There is not proposed any change in operating privileges for Technician licensees from that of the existing structure. The Technician Class license examination should have no more than 35 questions, primarily related to simple electronic theory and proper operation of equipment.<sup>4</sup> The amount of information currently called for in examination preparation materials available commercially is a significant obstacle to newcomers. When given the choice between obtaining an amateur radio license and any of the other interesting technical pastimes, such as microcomputing, the difference may well be the amount of material necessary to learn or memorize, just to obtain an initial license. Kenwood supports making the entry level examination a doorway to technical investigation, and that requires that the examination be the minimum necessary to demonstrate basic operational capability and safety, similar to a driver's license. The booklets that are given out by the Motor Vehicle Administrations to prepare for a driver's test, and the examination itself, are minimal by comparison to the material that must be learned, and is typically included in amateur preparation materials, prior to an amateur license examination.

8. The General Class license examination should be on 5 word-per-minute Morse Code and 50 written questions on intermediate electronic theory and operating techniques, including station configuration. The Extra Class license examination should consist of 100 questions,<sup>5</sup> and

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<sup>4</sup> It is well-known that modern radio amateurs utilize commercial equipment, but configure it themselves into station configurations. Proper operation of equipment and basic station architecture should be the proper focus of the entry-level license class.

<sup>5</sup> However, this number of examination questions would place a serious burden on the Volunteer Examiner Coordinators. Section 97.523 of the Commission's Rules sets forth the requirement that the question pools contain at least ten times the number of questions required for each examination. Unless this requirement is

should relate to advanced electronic theory and advanced communications systems.

9. Kenwood supports the deletion of the Novice and Technician-plus license classes. The Technician Plus class was merely a means of accommodating earlier holders of Technician class licenses prior to the creation of the codeless Technician license class. It serves no other purpose. The Commission proposes to simply stop issuing these licenses any longer, but to retain those operating privileges. Kenwood suggests that elimination of those license classes, and upgrading Novice and Technician Plus licensees (who have already had experience in HF operation and who have taken examinations relevant to HF operation) to General Class would allow those license classes to be eliminated immediately. This would be much simpler and would encourage Novice and Technician Plus licensees to remain active in Amateur Radio.

10. The most important part of the license restructuring proposed by the Commission is to revise the amateur radio question pools. The Commission's syllabus should be retained, but should be oriented toward radio theory and operation of equipment, and to eliminate those concerning subjects that licensees can easily learn on their own, such as operating subband divisions and information learned by memorization.

Therefore, Kenwood Communications Corporation requests that the Commission modify its proposal contained in the Notice in the foregoing respects; to proceed otherwise to streamline and simplify the Amateur Radio Service rules to encourage growth and expansion of the Service;

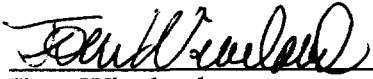
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revised, it would necessitate having question pools of at least 1,000 questions for the Extra Class license examination, and 500 for the General Class examination.

and to promote the use of the Amateur Service as a reservoir of self-trained electronics experts and experimenters.

Respectfully submitted,

**KENWOOD COMMUNICATIONS CORPORATION**

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